

1 December 2015

Project Manager
Proposal M1011
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear sir/madam,

**Proposal M1011 – Maximum Residue Limits (2015)
Call for Submissions**

The Food & Beverage Importers Association supports the inclusions of certain maximum residues limits (MRLs) as proposed in the Call for Submissions for Proposal M1011.

In particular, the Association specifically endorses the proposed maximum residue permissions for strawberries (Penconazole, Triadimenol), raspberries (Clopyralid), currants (Cyprodinil, Difenconazole, Fludioxonil, Pyraclostrobin) and cherries (Cyantranilprole, Dodine, Maldison, Metrafenone, Pyraclostrobin).

The FBIA supports these proposals on these grounds:

1. Foods referred to in the Proposal are currently imported.
2. The proposed MRLs align the limits in the Food Standards Code with the European Union, United States or Codex standards.
3. The FSANZ safety assessment concludes that the proposed variations do not present any public 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

Food & Beverage Importers Association

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Regulation of Residues of Agricultural and Veterinary Chemicals in Food; in particular it would

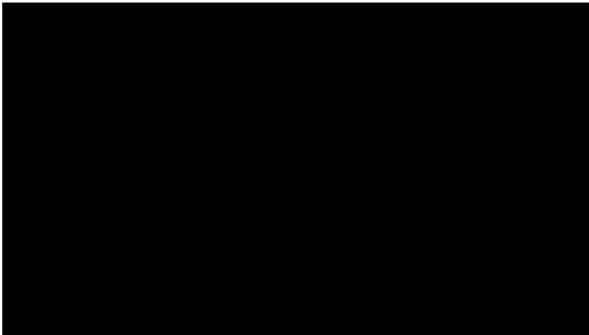
(a) be consistent with the effective regulation of the registration, permission and use of agricultural and veterinary chemicals;


(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