

Food Standards Australia New Zealand
PO Box 5423

KINGSTON ACT 2604

25 February 2018

Attention: Standards Management Officer

RE: Submission – Proposal M1015 – Maximum Residue Limits (2017) [36-18]

The Australian Food and Grocery Council (AFGC) support the continual review and update of the Australia New Zealand Food Standards Code (the Code) in order to reflect the current status of agricultural and veterinary (agvet) chemicals in use in Australia, and to support international trade through recognition of agvet chemicals in use in other markets (eg through alignment with applicable Codex Alimentarius standards).

The AFGC appreciate the opportunity to make a submission to this consultation.

Overall position

The AFGC **supports** ongoing review of agvet chemical MRLs and subsequent variations to the Code based on FSANZ assessment which indicate the proposed limits present negligible health and safety risks to consumers.

The AFGC request FSANZ consider inclusion of EU MRLs for “tea, green, black” for a number of agvet chemicals considered under M1015. The changes proposed for these agvet chemicals in M1015 are not aligned with EU MRLs and may therefore present an issue for international harmonisation.

The AFGC also request consideration of establishment of an “*All other foods except animal food commodities*” for thiophanate-methyl due to its use in tropical and sub-tropical fruit and products (juice concentrate, puree) in other countries.

General comments

FSANZ has noted in the call for submissions that any MRL deletions or reductions have the potential to restrict importation of foods and could potentially result in higher food prices and a reduced product range available to consumers.

The AFGC has previously advocated for the establishment of a default MRL similar to the arrangements in place in New Zealand, Canada and other of our trading partner countries.

In order for industry to operate in the global market, Australian regulation needs to develop a more comprehensive, innovative and **timely** approach to the management of low levels of agvet chemicals which pose no safety risk to Australian consumers.

The current approach of conducting an additional assessment for suitability to establish *All other foods except animal food commodities* MRLs according to the principles agreed by FSANZ and the APVMA in P1027 provides no certainty and minimal benefit to the food industry in Australia. Industry is still no further advanced and is disadvantaged by lost opportunities and the cost of sourcing materials compliant with Australian based MRLs.

Specific comments

Impacts on imported foods due to MRL variations proposed

The AFGC wishes to raise an issue in relation to the impact on tea due to the changes proposed under M1015 - based on the proposals for inclusions set out under section [1.4], tea would fall under the category "*All other foods except animal food commodities*".

The *All other foods except animal food commodities* MRLs proposed for the following agvet chemicals is inconsistent with MRLs permitted in the EU for tea.

Chemical	Proposed Australian MRL for All other foods except animal food commodities	EU MRL for tea
Clofentazine	0.02mg/kg	0.05mg/kg
Difenoconazole	0.02mg/kg	0.05mg/kg
Diflufenican	0.01mg/kg	0.05mg/kg
Emanectin	0.005mg/kg	0.02mg/kg
Fenbuconazole	0.02mg/kg	0.05mg/kg
Methidathion	0.02mg/kg	0.1mg/kg



Profenofos	0.02mg/kg	0.05mg/kg
Quinoxifen	0.02mg/kg	0.05mg/kg
Trifuralin	0.01mg/kg	0.05mg/kg

The AFGC request FSANZ consider an inclusion in Schedule 20 for “tea, green, black” as a commodity for each of the agvet chemicals listed in the table. Alignment to the EU MRL’s would allow harmonisation for internationally traded teas giving wider supply options.

The AFGC also request reconsideration of the need for an “*All other foods except animal food commodities*” MRL for thiophanate-methyl due to its use in tropical and sub-tropical fruit and products (juice concentrate, puree) in other countries.

Thiophanate-methyl was excluded from consideration of an *All other foods except animal food commodities* MRL as the only registered use of thiophanate-methyl in Australia is in non-food crops (ornamental plants) however this does not take into consideration use in other countries and the impact on imported foods.

Thank you for the opportunity to provide this input to FSANZ. If you require any further information, please do not hesitate to contact me.