



BRYANT CHRISTIE INC.
GLOBAL SOLUTIONS

February 22, 2018.

Food Standards Australia New Zealand
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AUSTRALIA
Phone: +61 2 6271 2222
Email: submissions@foodstandards.gov.au

Re: Submission on the draft food regulatory measure changes to maximum residue limits - Proposal M1015

Dear Sir or Madam:

On behalf of the North American Blueberry Council (NABC), please accept the following comments to the draft food regulatory measure – Proposal M1015 - regarding the active ingredient difenoconazole.

Market	Source	Commodity	Active Ingredient	U.S. MRL	Codex MRL	Existing MRL	Proposed MRL
Australia	M1015 – Maximum Residue Limits (2017): Call for submissions and Supporting document 1	Blueberry	Difenoconazole	4	-- Proposed: 4	--	<i>{0.02}</i> *

**All other foods except animal food commodities*

Difenoconazole is registered for use on U.S. blueberries and is especially useful for control of primary and secondary infections of mummy berry disease, and useful for Alternaria fruit rot. Inspire Super (difenoconazole + cyprodinil) is especially useful as a rotation partner.

For international harmonization and trade facilitation purposes, the NABC kindly requests that FSANZ consider adopting a MRL for difenoconazole on blueberries that is harmonized with the corresponding U.S. MRL of 4 ppm. This would also be harmonized with the proposed Codex MRL that is coming into effect.

The U.S. and Australia MRLs for cyprodinil are already harmonized, so having the difenoconazole MRL also harmonized would allow use of Inspire Super on berries destined for the Australian market.

Thank you for your consideration of these comments. Please let us know if there are any questions.

Best regards,

/S/