

10 February 2015

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

standards.management@foodstandards.gov.au

Dear Standards Management Officer

Re: Submission on Proposal P1027 – Managing low-level Ag & Vet chemicals without 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 chemical crop protection products and agricultural biotechnologies. The plant science industry provides products to protect crops against pests, weeds and diseases, as well as developing crop biotechnologies that are key to the nation's agricultural productivity, sustainability and food security. The plant science industry is worth more than \$17.6 billion a year to the Australian economy and directly employs thousands of people across the country. CropLife Australia is a member of the industry's international federation which is made of 91 national associations globally.

CropLife and its members are committed to world's best practice stewardship of their products throughout their lifecycle and to ensuring that human health, environment, security and trade issues associated with agricultural chemical use in Australia are responsibly and sustainably managed. Our member companies therefore have a particular interest in ensuring that residues of agricultural chemical products are efficiently and effectively regulated.

CropLife notes that under current federal, state and territory governments' food legislation there must be no detectable agricultural chemical residue in a food commodity for which a MRL has not been set. This zero tolerance approach makes the inadvertent presence of agricultural and veterinary (AgVet) chemical residues resulting from legal use a non-compliance of the *Australia New Zealand Food Standards Code* (the Code). This is compounded by non-compliant residues in food being able to be identified more readily because of improved sensitivity of analytical detection systems that can reliably quantify down to parts per billion.

CropLife supports, in principle, the approach considered in Proposal P1027 (the Proposal) to manage the presence of low-level residues of AgVet chemicals without specific MRLs by setting MRLs for '*all other foods*'. The arguments in the Proposal for not proceeding with a default MRL are reasonable and a risk-based approach, using assessment of a chemical's short term and/or chronic dietary exposure to confirm the level of risk, is appropriate. CropLife expects that the adoption of the Proposal would significantly reduce the number of inquiries FSANZ receives regarding acceptable AgVet chemical residues in imported food not listed in the Code, by removing the need to establish too many MRLs specifically for import purposes.



CropLife trusts that the above comments will assist FSANZ in delivering a process to effectively manage the presence of low-level residues of agricultural and veterinary chemicals without specific MRLs, and 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.

Matthew Cossey
Chief Executive Officer

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