



SUBMISSION

Response to the FSANZ proposal for managing low-level AgVet Chemicals without MRLs.

Date 3 June 2016

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Response to the FSANZ proposal for managing low-level AgVet Chemicals without MRLs.

Thank you for the opportunity for Grain Producers Australia to provide a response to the FSANZ proposal for managing low-level AgVet Chemicals without MRLs. In consideration of the Food Standards Australia New Zealand Proposal P1027 - Managing Low-level AgVet Chemicals without MRLs¹, Grain Producers Australia in principle supports the initiatives FSANZ has undertaken through the pilot study in addressing low-level AgVet chemicals without MRLs. There are however concerns in regards to adequate FSANZ resources in addressing its implementation and potential for confusion in communicating compliance with food safety to the community and markets on low-level MRLs.

The grains industry represented by Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level. GPA was created to foster a strong, innovative, profitable, globally competitive and environmentally sustainable grains industry in Australia. The objectives of GPA are to establish a strong independent national advocate for grain producers based on a rigorous and transparent policy development process; engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain; and facilitate a strategic approach to Research, Development and Extension intended to deliver sound commercial outcomes for industry.

As the peak industry body representing grain growers, GPA recognises that under certain circumstances, due to spray drift to adjacent crops or in some rotational crop situations, 'inadvertent' or 'adventitious' residues may be found in food commodities following legitimate use of an AgVet chemical. The grains industry is a major stakeholder in ensuring this program delivers confidence in outcomes to both the industry, food trade and community as it uses more than 65% of all AgVet products in the Australian market.

GPA is pleased to observe that the results of FSANZ pilot study of the dietary exposure assessment for the 19 (mainly grains related) chemicals indicate that the proposed *All other foods except animal food commodities* MRLs are safe and there are no public health and safety concerns.

GPA has some concern with the proposed FSANZ approach including:

- Potential market risk impacts for a regulator to develop a system outside the scope of global requirements
- That the potential approach may not support the immediate needs of growers – in that the proposed approach may be too slow to address the immediate needs of industry
- That FSANZ will be able to adequately resource the proposed approach at reasonable cost to deliver timely benefit to industry
- The approach potentially creates additional and unnecessary fear in the general community of MRL compliance in similar commodities with significantly different MRLs.

¹ <http://www.foodstandards.gov.au/code/proposals/Documents/P1027-AgVet-Chems-CFS.pdf>

GPA recognises that:

- The proposed model provides some marketing advantages for importing and domestic traders
- The Canadian and NZ approach using a default MRL of 0.1 mg/kg or the EU and Japan approach of 0.01 mg/kg has served these countries well in addressing immediate default MRL needs
- A key issue with a default MRL approach is that it may result in the dietary basket - acceptable daily intake (ADI) being filled, resulting in the rejection of applications establishing new crop MRLs for the same product
- Canada, NZ, EU and Japan are also considering moving to the proposed FSANZ approach, in part to address complexities of addressing ADI complexities from the use of default MRLs.

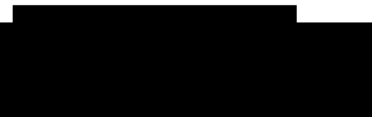
To address these risks and issues, GPA proposed the following for consideration by FSANZ:

- GPA supports in principle the proposal by FSANZ in delivering the approach in the longer term, recognising the significant immediate resource and time to delivery risks. The approach will resolve a number of longer-term risks and MRL issues for the grains industry
- Australia should immediately set up a default MRL of 0.01 (as per EU/Japan) to deal with the immediate backlog of low-level AgVet Chemicals without MRL until such a time as the proposed FSANZ approach can be fully implemented for the backlog of priority MRLs
- There is potential for industry, including GPA on behalf of the grains industry to provide advice and support to FSANZ in quickly prioritising for low-level AgVet Chemicals without MRLs through considering relevant industry use, needs and practices
- If ADI issues become a concern for certain products as a result of default MRLs, then these should be prioritised for early review by FSANZ
- The language of the resulting default MRLs would also have to be carefully presented so as to avoid market confusion on safe food MRLs.

GPA is committed to further discussion with the Australian Government on the need to manage current and future risk associated with managing low-level AgVet chemicals without MRLs. There is commitment from GPA to work cross industry and deliver cost effective outcomes for agricultural industries and supporting Australian economy and community.

If you would like to discuss any of these comments and suggestions further in detail, please contact me on email 

Yours sincerely



Andrew Weidemann
Chairman GPA