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**Submission to Food Standards Australia New Zealand on Proposal M1010 -
Maximum Residue Limits (2014)**

1. About AUSVEG

AUSVEG is the National Peak Industry Body representing the interests of Australian vegetable and potato growers. We represent growers around Australia and assist them by ensuring the National Vegetable Levy and the National Potato Levy are invested in research and development (R&D) that best meets the needs of the industry.

AUSVEG also makes representations on behalf of vegetable and potato growers to ensure their interests and concerns are effectively communicated to all levels of government, in the public sphere, and throughout relevant areas of the private sector.

AUSVEG executes its brief by delivering national projects in the areas of communication and the environment, as well as by providing leadership for our sector on a range of key issues.

2. Queries

For more information regarding this submission please contact AUSVEG Minor Use and Agronomy Coordinator, [REDACTED], on (03) 9882 0277 or at [REDACTED].

Yours sincerely

[REDACTED]

Richard J Mulcahy
Chief Executive Officer

AUSVEG Ltd Submission to Food Standards Australia New Zealand on Proposal M1010 - Maximum Residue Limits (2014)

Summary

With respect to the proposal put forward, AUSVEG offers the following views:

1. AUSVEG supports variations to approved maximum residue limits of chemicals in the agricultural sector to align Australia with international standards.
2. AUSVEG supports the inclusion of further crops in approved maximum residue limits of chemistry approved in Australia.
3. AUSVEG believes that there is available opportunity for further chemicals to have approved maximum residue limits varied in such a way to bring Australia further in line with international standards.

Introductory remarks

AUSVEG welcomes the opportunity to present this submission to Food Standards Australia New Zealand regarding Proposal M1010 - Maximum Residue Limits (2014).

The Australian vegetable industry has a production value of AU\$3.8 billion¹ and is renowned for the quality and safety of its produce. This quality and safety is created through an in-depth understanding of safe chemical use and consistent advancements in approved chemistry to treat pest issues. The proposal presented by Food Standards Australia New Zealand (FSANZ) puts forward variations to certain maximum residue limits (MRLs) for some agricultural chemicals that may legitimately occur in food in Standard 1.4.2 in the *Australia New Zealand Food Standards Code* (the Code).

AUSVEG recognises the importance of variations in approved MRLs for certain chemicals, as outlined in the proposal, to bring several selected chemical MRLs for Australia more in line with internationally accepted standards. The proposal also puts forward new MRLs for additional crops across several of the chemicals selected, which will assist in greater quality of produce for those crops due to increased variation of chemistry allowed to treat approved pest issues.

¹ Australian Bureau of Statistics, *Catalogue 7503.0 Value of Agricultural Commodities Produced 2012-13*

Response to proposed MRL changes

AUSVEG supports the action to vary certain MRLs as proposed. This will have the effect of bringing the recognised Australian MRLs of the selected chemicals in line with internationally approved limits. This is positive for the Australian agricultural industry for a range of reasons, including its contribution to improved market access for export while avoiding the need to establish specific spray regimes to meet the phytosanitary demands of particular countries. The proposal will also provide a valuable increase in the overall number of crops able to make use of chemistry to treat specific pest and biosecurity issues.

Allowing additional crops into approved use due to the proposed variations in MRLs is strongly supported by AUSVEG. If Australia were to not modify these MRLs as put forward, then the agricultural industry would continue to lag behind the rest of the world for approved uses and allowable chemicals to treat various pest issues. AUSVEG encourages further modifications to MRLs in the future to bring more of Australia's approved chemicals in line with international standards, especially with respect to establishing additional MRLs for a wider range of crops.