

U.S. COMMENTS – G/SPS/N/AUS/443
PROPOSAL M1015 – MAXIMUM RESIDUE LEVELS (2017)

BEGIN U.S. COMMENTS:

The United States appreciates the opportunity to comment on the draft regulation, “Proposal M1015 – Maximum Residue Limits (2017),” notified to the World Trade Organization (WTO) as G/SPS/N/AUS/443 on January 15, 2018. The United States offers the following comments for your consideration.

The United States notes that Australia has proposed establishing maximum residue limits (MRL) for a number of commodities. There is a concern that the proposed MRLs could have a negative effect on U.S. exports. In particular, the concern is with the following MRLs:

Chemical	Commodity	U.S. MRL	Australia’s Current MRL	Australia’s Proposed MRL
Difenoconazole	Blueberry	4.0 ppm	--	0.02* ppm
Etiozazole	Strawberry	0.5 ppm	0.05* ppm	0.2 ppm
Fenpyrazamine	Ginseng	0.7 ppm	--	0.02* ppm
	Grape	1.5 ppm	3.0 ppm	0.02* ppm
	Lettuce	2.0 ppm	--	0.02* ppm
	Strawberry	3.0 ppm	--	0.02* ppm

* MRL proposed for the “All other foods” category.

In September 2017, the Joint Food & Agriculture Organization of the United Nations /World Health Organization Meeting on Pesticide Residues proposed to establish a Codex MRL for difenoconazole on blueberry at 4.0 parts per million (ppm). Will Australia consider harmonizing with the U.S. MRL and/or the Codex proposed MRL of 4.0 ppm for difenoconazole on blueberry? Similarly, for all remaining MRLs listed above, will Australia consider harmonizing with U.S. MRLs, in order to avoid any disruption to trade?

Finally, Food Standards Australia New Zealand (FSANZ) stated in this measure the “need for standards to be based on risk analysis using the best available scientific evidence.” With that in mind, the United States is interested in the methods and standards, or best available evidence, FSANZ used when developing the proposed MRLs. Would Australia please provide the scientific justification for the proposed MRLs? The United States will provide the scientific data used to set U.S. MRLs, if requested.

Australia is an important market for the United States. The United States appreciates your consideration of these comments and looks forward to your response.

END U.S. COMMENTS

March 16, 2018