

3 June 2016

The Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 5423  
**KINGSTON ACT 2604**

Email: [standards.management@foodstandards.gov.au](mailto: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 national 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.

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.

The existing zero tolerance approach under current federal, state and territory governments' food legislation means there must be no detectable agricultural and veterinary (AgVet) chemical residue in a food commodity for which a Maximum Residue Limit (MRL) has not been set. However, the legitimate use of AgVet chemicals can result in their inadvertent presence in food commodities without an associated MRL due to a range of factors including spray drift. The detection of this residue would be considered a non-compliance of the *Australia New Zealand Food Standards Code* (the Code) even though its present poses no threat to health or safety. With technical advances continually increasing the sensitivity of analytical methodology, now reliably quantifying down to parts per billion, the detection of inadvertent residues from legitimate use becomes increasingly likely.

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 except animal food commodities*'. The arguments 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.

The Proposal is, however, significantly more complicated and resource intensive compared to the introduction of a default MRL. CropLife notes that this project has been prioritised due to the long-standing need to address issues associated with the existing zero tolerance approach, and understands that once established, the process is expected to become part of routine MRL setting procedures. Unfortunately, this does not adequately satisfy questions regarding how specifically FSANZ and the APVMA are going to resource the evaluation required to set appropriate MRLs for '*all other foods except animal food commodities*' on the substantial number of AgVet chemicals needing them. Additional information on resourcing the capability and expected timeframes is warranted.



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.

Please do not hesitate to contact CropLife's Policy Manager, Agchem Regulation and Stewardship, Mr Alastair James (02 6273 2733 [alastair.james@croplife.org.au](mailto:alastair.james@croplife.org.au)) should you require clarification in respect of this issue.

Yours sincerely

Matthew Cossey  
Chief Executive Officer