



9 August 2012

Food Standards Australia New Zealand

PO Box 7186

CANBERRA BC ACT 2610

Dear FSANZ,

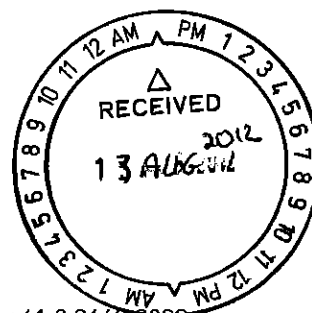
**Submission - M 1008 (Maximum Residue Limits 2012)**

The Australian Beverages Council (the Beverages Council) is the peak body representing the \$7 billion non-alcoholic beverage industry. The Beverages Council provides a single, united industry voice to a range of stakeholders including government, non-government organisations, media and general public.

Membership of the Beverages Council comprises over 95% of the non-alcoholic industry's production volume, and is comprised of multi-national companies and small and medium businesses. The Beverages Council has two dedicated category divisions – Fruit Juice Australia and the Australasian Bottled Water Institute, which represent the unique interests of members manufacturing juice and bottled water products respectively.

The Beverages Council has provided to FSANZ a range of technical data and industry insights to assist with the development of M1008. We wish to acknowledge the collaborative, transparent and flexible approach FSANZ took in this process, and provide this submission in good faith.

The areas that are proposed for amendment by FSANZ relevant to members of Fruit Juice Australia include changes to residue for limits for juices, purees, concentrate, orange peel extract and comminute. This will impact the maximum residual limits for the following pesticides, fungicides and insecticides: Acephate; Atrazine; Azinphos-methyl; Carbaryl; Carbendazim; Chlorfenvinfos; Chlorpyrifos; Diazinon; Dichlorvos; Dimethoate; Diquat; Fenamiphos; Fenitrothion; Fenthion; Methiocarb; Parathion-Methyl; Polihexanide; Procymidone; Trichlorfon.



Australian Beverages Council Ltd

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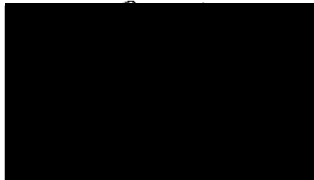




The Beverages Council has consulted its membership most likely to be impacted by these proposed changes and submit that these MRLs provide a workable level for the above chemicals so as to ensure first and foremost safety for consumers, as well as to ensure a viable domestic non-alcoholic beverages industry that must rely on imports from time to time for some of its products. **To that end, the Beverages Council can support the detail in M1008.**

We thank FSANZ for the opportunity to provide this submission. If you wish to discuss any aspect of this correspondence in more detail I invite you to contact me directly on 02 9662 2844 or [kim.staples@australianbeverages.org](mailto:kim.staples@australianbeverages.org).

Yours sincerely,



Health and Regulatory Affairs Manager

A decorative, wavy handwritten flourish or signature mark.

