

November 26, 2014

Food Standards Australia New Zealand
Post Office Box 7186
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Australia

Ref: Maximum Residue Limits – Proposal M1010

On behalf of the California Fresh Fruit Association (CFFA), I would like to thank Food Standards Australia New Zealand (FSANZ) for considering international MRL requests as part of Proposal M1010. We are pleased to see dozens of new stone fruit MRLs included in Proposal M1010, many of which were requested by CFFA in a joint effort with the California Cherry Board and Northwest Horticultural Council.

While we do not wish to discount the accomplishments of Proposal M1010, we would also like to take this opportunity to comment on FSANZ's policy regarding the refined proposal process being limited to only highest residue (HR) and supervised trials median residue (STMR) data published by the FAO-WHO Joint Meeting on Pesticide Residues (JMPR). In requesting MRLs for Proposal M1010, there were several cases in which FSANZ stated that the MRL would not be considered due to a recent policy decision which concluded that FSANZ will only consider chemicals where there are Health Based Guidance Values (HBGVs), which are required for the Dietary Exposure Assessments (DEA), available through either the Office of Chemical Safety (OCS) or JMPR. FSANZ stated that it will only consider HBGVs from other sources for chemicals that have previously been considered in other MRL proposals. This policy poses a significant drawback for future MRL requests in which there is a lack of available STMR and HR data from JMPR. There is no guarantee that all chemicals/commodity combinations will move through the Codex process, and there is also a concern that a registrant may not be willing to perform/submit data just to support a single commodity. FSANZ's current policy on data sourcing therefore may prove difficult when working towards harmonizing tolerances necessary within the scope of trade. We respectfully request that FSANZ reconsider this policy in future MRL proposals.

Again, thank you for your consideration of CFFA comments and MRL requests. We look forward to continuing to work with FSANZ to seek additional MRLs in Australia in the future.

Regards,
California Fresh Fruit Association



Director, Trade

