

1 December 2015

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610

Dear Sir/Madam

Call for submissions – Proposal M1011: Maximum Residue Limits (2015)

I write in response to a request for comments on the abovementioned proposal.

1. Industry Introduction

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP).

The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia.
- Has members across the entire grain supply chain.
- Hosts an annual forum providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to <http://www.graintrade.org.au/nwpgp>

2. Comments on Proposal M1011

The NWPGP wishes to comment only on the following as part of proposal M1011:

Compound	Proposed Change/Deletion		Proposed Change/Insertion	
	Commodity	MRL	Commodity	MRL
Carbaryl	Cereal grains [except barley; sorghum]	5	Cereal grains [except barley; rice; sorghum]	5
			Oilseed [except cotton seed]	0.1
			Pulses	0.1
			Rice	7
	Wheat Bran, unprocessed	T20	Wheat Bran, unprocessed	10

The NWPGP supports the changes proposed by FSANZ for carbaryl.

In support of this:

- The APVMA has in place appropriate MRLs for carbaryl on oilseeds and pulses.
- The current lack of an FSANZ MRL for canola (and oilseeds/pulses) has caused industry some concerns in recent years, with the Market Trends Survey identifying it as a priority for listing on our Market GAP list. It was subsequently included on our submission to FSANZ in June 2015 under Proposal P1027 "Chemicals for Application to FSANZ for a Low Level MRL in Australia.
- The NWPGP supports the harmonisation of the APVMA and FSANZ MRLs.

It is noted that the current FSANZ Standard 1.4.2 located on the comlaw website, as at 3 November 2015, lists the following for carbaryl:

Cottonseed	3
Sunflower seed	1

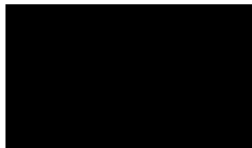
Given the existing FSANZ Cottonseed and Sunflower seed MRLs, the new entry for Carbaryl should potentially read:

Oilseed [except cottonseed; sunflower seed] 0.1

(Note there is no separate APVMA Sunflower seed MRL, as this is covered under Oilseeds).

Thank you for the opportunity to comment. Should you have any questions on this submission please feel free to contact me as per the below details.

Regards



Gerard McMullen
Chair
National Working Party on Grain Protection

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