



To: Project Manager M1015

From: Nicole Smith

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SUBMISSION IN RESPONSE TO PROPOSAL M1015 MAXIMUM RESIDUE LIMITS (2017)

Thank you for the opportunity to comment on Proposal M1015 Assessment Report Maximum Residue Limits (2017).

Unilever Australasia is an international manufacturer and marketer of food, home and personal care products and is a market leader in a number of categories in Australia and NZ. Our well known brands include: Continental, Streets, Lipton, Knorr, Domestos, Dove, Jif, Omo, Rexona, Tresemme, Sunsilk and Vaseline. Our products are used everyday by millions of people around the world. Consumers trust us to provide them and their families with products that are suitable and safe for use.

We fully support FSANZ's role to maintain an updated Code in order to reflect the current registration status of agricultural and veterinary chemicals in use in Australia and thus ensure consumer safety. We also support the alignment of Australian regulations against current international best regulatory practices to promote exchange of innovation of goods between Australia and trading partners.

We fully support the amendments detailed in section 1.1, 1.2 and 1.3 of the proposal and therefore the update of Schedule 20 Maximum Residue Limits and standard 1.4.2 Agvet Chemicals (applies in Australia only).

Based on the proposals for inclusions under section 1.4 tea would fall under the category "*All other foods except animal food commodities*". We request FSANZ consider adopting an alignment to the EU MRL's for tea for the following chemicals (in the category All other foods except animal food commodities): Clofentizine, Difenconazole, Diflufenican, Emanectin, Fenbuconazole, Methidathion, Penconazole, Permethrin, Profenofos, Quinoxifen, Trifuralin.

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Alignment to the EU MRL's would allow harmonisation for internationally traded teas giving wider supply options resulting in consumer benefits on price and quality.

Alternatively, we request the inclusion of "Tea, green, black" as a category for these chemicals so they do not fall under the "All other foods except animal commodities" category.

Chemical	Proposed Australian MRL for All other foods except animal food commodities	EU MRL for tea
Clofentazine	0.02mg/kg	0.05mg/kg
Difenoconazole	0.02mg/kg	0.05mg/kg
Diflufenican	0.01mg/kg	0.05mg/kg
Emanectin	0.005mg/kg	0.02mg/kg
Fenbuconazole	0.02mg/kg	0.05mg/kg
Methidathion	0.02mg/kg	0.1mg/kg
Profenofos	0.02mg/kg	0.05mg/kg
Quinoxifen	0.02mg/kg	0.05mg/kg
Trifuralin	0.01mg/kg	0.05mg/kg

Unilever, as a member of the AFGC and the Food & Beverages Importers Association (FBIA) fully supports submissions on this proposal made by FBIA and the AFGC. Should further information be required to assist with this review, please contact me directly via the details given below.

Yours sincerely

Nicole Smith

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