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**Submission - FSANZ Proposal P1027**  
**Managing Low-level Ag & Vet Chemicals without MRLs**

The Australian Grape and Wine Authority (trading as Wine Australia) is supportive of Proposal P1027 as a practical means to manage low levels of AgVet chemical residues in food commodities.

The approach suggested in the proposal to create MRLs where there are no known public health and safety concerns will assist our industry directly, and also other food commodities where viticultural activities may inadvertently lead to detectable chemical residues. The proposal would ensure that very low residue levels near the analytical limit of determination would not become a barrier to the sale of goods in the Australian market.

The adoption of the proposed regime will ensure that AgVet chemicals listed in the code can continue to be used in a way that supports good agricultural practice, such as the rotation of chemical activity groups, and that specific chemical active ingredients do not become delisted for use due to issues with inadvertent, low level residues.

We agree that an evidence-based scientific approach to setting MRLs to ensure that there are no health or safety risks to consumers is appropriate and essential. However, Wine Australia supports the interim use of appropriate default MRLs (e.g. 0.01 mg/kg) to avoid the issues identified with 'zero tolerance', until individual MRLs can be determined according to the proposed FSANZ/APVMA protocols.

We recognise that the changes proposed in P1027 will predominantly impact on and benefit domestic and imported foods, however the approach outlined in P1027 is consistent with that being pursued in various international wine trade forums. The World Wine Trade Group, for example, is discussing the adoption of a range of good regulatory principles, including one specifically addressing the adventitious presence of material not present as a result of deliberate action by the wine manufacturer.

Similarly, the APEC Wine Regulators Forum is developing a protocol to address the potential for trade impediment arising from conflict between agrichemical residue requirements between the exporting and importing economies.

We commend FSANZ for its initiative in this area.

Yours sincerely

Andreas Clark  
Chief Executive Officer