



23 August 2013

Project Manager  
Proposal M1009  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear sir/madam,

### **Proposal M1009 – Maximum Residue Limits**

The Food & Beverage Importers Association supports the variations of certain maximum residues limits (MRLs) proposed in Proposal M1009.

In making this submission, we wish to endorse specifically the proposed maximum residue permissions for blackberries, strawberries, blueberries, raspberries, boysenberries, berries and other small fruits and cherries.

The FBIA supports these proposals on these grounds:

1. Foods affected by the Proposal are currently imported.
2. The proposed MRLs align the limits in the Food Standards Code with international standards, such as those of the USA or CODEX.
3. The FSANZ safety assessment concludes that the proposed variations do not present health or safety concerns.
4. The Proposal provides for legitimate and safe trade.
5. The setting of maximum residue limits (MRLs) for these chemicals in these foods would be in line with the Ministerial Council Policy Guideline on the Regulation of Residues of Agricultural and Veterinary Chemicals in Food; in particular it would

**Food & Beverage Importers Association**

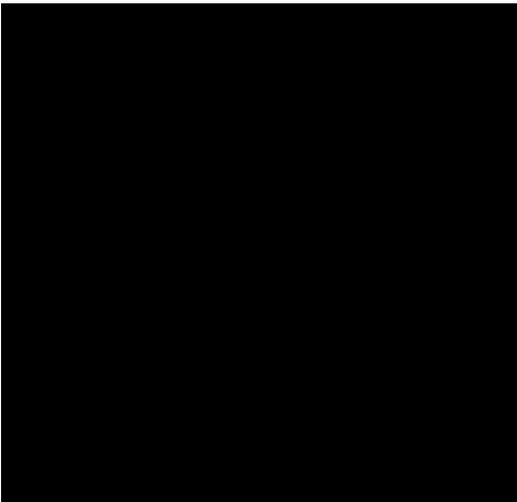
**Email:** [fbia@fbia.org.au](mailto:fbia@fbia.org.au) 181 Drummond Street,  
**Telephone:** (03) 9639 3644 Carlton, Victoria 3053  
**Facsimile:** (03) 9639 0638 ABN 53 932 472 760



- (a) be consistent with the effective regulation of the registration, permission and use of agricultural and veterinary chemicals;
- (b) promote a consistent approach to MRLs for both domestic and imported foods; and
- (c) be consistent with Australia's obligations under the World Trade Organisation (WTO) Sanitary and Phytosanitary Agreement (SPS Agreement).

Should you have any questions on these comments, please do not hesitate to contact me

Yours faithfully,



Secretary