



CALIFORNIA
GRAPE & TREE FRUIT
LEAGUE

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August 23, 2013

[REDACTED]
Risk Manager
Product Safety Standards
Food Standards Australia New Zealand
P.O. Box 7186
Canberra BC ACT 2610
Australia
[REDACTED]

RE: Proposal M1009 - Maximum Residue Limits

[REDACTED]

The California Grape and Tree Fruit League thanks you for the openness and transparency of Food Standard Australia New Zealand's (FSANZ) maximum residue level (MRL) review process and the willingness to work with organizations such as ours that represent the growers and shippers of various commodities.

The League is a public policy agricultural trade association representing the state of California's table grape and deciduous tree fruit industries; our members produce fresh fruit throughout the state and include: Coachella Valley (table grapes), San Joaquin Valley (all commodities), Santa Clara County (cherries), Lake County (pears), as well as Mendocino, Yuba, Stanislaus, San Joaquin and Sacramento counties (pears, plums, cherries, kiwi, apricots).

As you know, Australia is a new market for U.S. stone fruit exports, with the first shipments of California peaches and nectarines arriving in July 2013. U.S. stone fruit is counter-seasonal to Australian production, and enters the market when domestic supply is limited. U.S. stone fruit therefore complements rather than competes with Australian stone fruit, and we are pleased to offer Australian consumers access to high-quality California stone fruit when Australian fruit is not available.

With the opening of this promising new market for California stone fruit exports, we are striving to ensure there are no market access issues which could impede trade, including any potential MRL barriers.

In Schedule 1.1 of Proposal M1009, we see that FSANZ intends to omit from Standard 1.4.2 all entries in Standard 1.4.2 for **thiophanate-methyl**. While the proposal will then add a 20 ppm tolerance for thiophanate-methyl on cherries, this action would effectively delete the current Australian MRLs for thiophanate-methyl on apricot at 2 ppm, nectarine at 0.2 ppm, and peach at 0.2 ppm.

Following is a chart outlining the current situation:

Active Ingredient	Commodity	U.S. MRL	Codex MRL	Current AUS MRL	Proposed AUS MRL in M1009
Thiophanate-methyl	Apricot	15	2	2	---
Thiophanate-methyl	Nectarine	3	2	0.2	---
Thiophanate-methyl	Peach	3	2	0.2	---

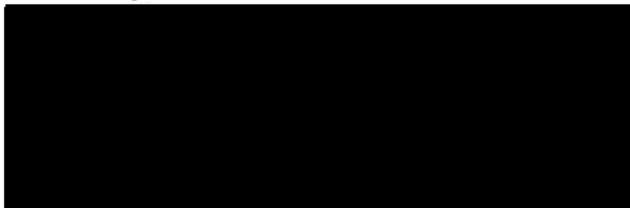
As thiophanate-methyl is still used by California stone fruit growers, we are concerned that the removal of Australia's current thiophanate-methyl MRLs for apricots, nectarines, and peaches could potentially disrupt trade to this important new market.

We respectfully request that Australia either harmonize its thiophanate-methyl MRLs for apricots, nectarines, and peaches with the Codex MRLs or, if possible, increase these tolerances to the levels of the established U.S. MRLs.

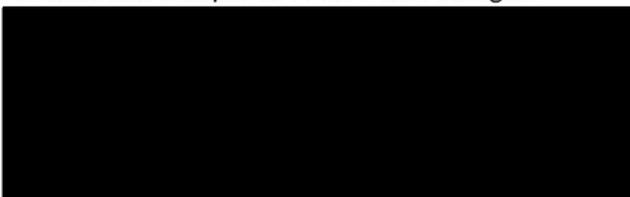
We thank you for this opportunity to comment on Proposal M1009 and look forward to your response.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Director of Trade
California Grape & Tree Fruit League



Associate Director
California Grape & Tree Fruit League