

NORTHWEST HORTICULTURAL COUNCIL

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Food Standards Australia New Zealand
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Dear Kate:

RE: Submission
M1009 Maximum Residue Limits Assessment Proposal
Australia New Zealand Food Standards Code

The California Grape and Tree Fruit League, the California Cherry Board and Northwest Horticultural Council offer these comments in response to the M1009 MRL Assessment Proposal.

First, we thank FSANZ for issuing the updated Standard 1.4.2, Amendment 98, June 13, 2013, which incorporated additional MRLs for cherries (chlorpyrifos and indoxacarb) and for stone fruit (boscalid, zeta-cypermethrin, penthiopyrad and fluxapyroxad). We value your commitment to working with the growers and shippers of the United States by assisting us in delivering high quality fruit and are grateful for the transparency of the process.

As part of the M1009 Assessment Proposal, we appreciate that Australia has proposed to harmonize the thiophanate methyl MRL on cherries at the U.S. value of 20 ppm.

On July 19, the United States gained access to Australia for peaches and nectarines. We are now working to ensure that trade issues are avoided and we can smoothly transition these new commodities into the Australian market. As always, we believe that harmonizing MRLs among trading partners is of utmost importance.

In anticipation of the stone fruit agreement, in November 2012 we provided a list of priority chemicals for potential inclusion in future reviews. To our understanding, no decision has yet been made as to when our proposed requests from 2012 will be included in future *Submission Assessments*. We are open to working with you as you review these chemicals and offer our assistance in any way we can. We would be very appreciative if our stone fruit requests (especially for cherries, nectarines and peaches) could be included in M1010.

The following table provides a summary of current MRL requests.

Proposed MRLs for inclusion in M1010

Chemical	Commodity/Crop Group	U.S. MRL (ppm) Requested	Australia MRL (ppm)
Abamectin	apricot, cherry, nectarine, peach, plum	0.09	none
Cyflufenamid	pome fruit (apple, pear)	0.06	none
Diflubenzuron	apricot, nectarine, peach, plum	0.07	none
Fluopyram	cherry	0.6	none
	apple	0.3	none
Flutriafol	pome fruit (apple, pear)	0.4	none
	stone fruit	1.5	none
Methoxyfenozide	plum	0.3	none
Myclobutanil	apricot, nectarine, peach, plum	2	none
Permethrin	nectarine, peach	1	none
Pyraclostrobin	apricot, nectarine, peach, plum	2.5	none
Quinoxifen	apricot, nectarine, peach, plum	0.7	none
Sulfoxaflor	cherry	3	none
	stone fruit (except cherry)	0.6	none
	pome fruit	0.5	none
Tebuconazole	apricot, nectarine, peach, plum	1	none

The Australian market is important to the United States stone and pome fruit industries. In 2012, over 10 million pounds of cherries were exported to Australia from the United States with a 39% increase in volume over the previous year. We attribute some of this increase to additional MRLs being established for our fruit. California peach and nectarine exports are roughly 1.6 million pounds (80,000 cartons) since initiating the work plan on July 23rd, so working to harmonize chemical tolerances for these commodities are very important. In anticipation of a future opportunity for the pome fruit market to be opened, we have included pome fruit MRLs for consideration.

Please feel free to contact us for clarification or comments.

We thank you for your consideration of our above comments and look forward to working with you.

Sincerely,

NORTHWEST HORTICULTURAL COUNCIL



Deborah Carter



Laura Grunenfelder



Dr. Michael J. Willett



Marcy L. Martin
California Grape & Tree Fruit League



Matt Lantz
Bryant Christie Inc.
on behalf of the California Cherry Board