



10th February 2015

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The Australian Mushroom Growers Association (AMGA) welcomes the opportunity to provide a response to the discussion paper *P1027 Consultation Paper – Managing Low-level Ag and Vet Chemicals without Maximum Residue Limits*

The AMGA welcomes the proposed approach to better manage low-level adventitious residues.

The Australian mushroom industry is low user of agricultural chemicals and due to the nature of the commodity, relies heavily on the maintenance of good farm hygiene in mushroom production.

To avoid the introduction of deleterious mushroom pests and pathogens the industry relies heavily on the proactive use of products such as disinfectants and sanitizers to treat farming equipment, work surfaces and utensils to minimise the risk of contamination.

While treated equipment and surfaces are washed, the fact that a risk of residue transferral exists was highlighted to the industry in the FSANZ 23rd Total Diet Survey, in which 2-phenylphenol, a sanitizer, was detected at very low levels on one mushroom sample.

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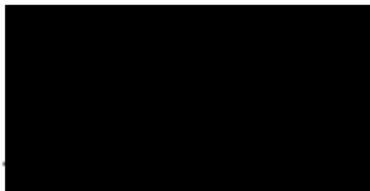
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That such inadvertent residues can, as indicated in the discussion paper, place a “*significant burden on industry*” given the current zero tolerance approach to chemicals with no listed MRL. This concern is further heightened with the increasing sensitivity being applied in analytical methodologies. Consequently, the AMGA asks that FSANZ and the APVMA consider undertaking an assessment examining the possibility of developing MRLs to accommodate low-level residues that may result from the use of sanitizers in mushroom production.

The AMGA would therefore welcome an opportunity to discuss further what contribution it could make to help facilitate and inform such an assessment, e.g., collation of industry based monitoring data.

Yours sincerely,

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General Manager
Australian Mushroom Growers' Association