

Australian Food and Grocery Council APPLICATION

13 MARCH 2013

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

IN RELATION TO:
APPLICATION TO AMEND STANDARD 1.4.2 MAXIMUM
RESIDUE LIMITS IN THE *AUSTRALIA NEW ZEALAND FOOD
STANDARDS CODE*.



The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover in the 2010-11 financial year of \$110 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector accounts for over one quarter of the total manufacturing industry in Australia.

This diverse and sustainable industry is made up of over 22,600 businesses and accounts for over \$49 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry spends \$466.7 million a year on research and development.

The food and grocery manufacturing sector employs more than 296,300 Australians, representing about 3 per cent of all employed people in Australia, paying around \$11.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia². It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

² About Australia: www.dfat.gov.au

EXECUTIVE SUMMARY

The purpose of this Application is to request incorporation of certain maximum residue limits (MRLs) for agricultural chemicals that may legitimately occur in food in Standard 1.4.2 of the *Australia New Zealand Food Standards Code* (the Code).

Standard 1.4.2 lists the MRLs for agricultural and veterinary chemical residues which may occur in foods in Australia. Limits prescribed in the Code constitute a mandatory requirement applying to all food products of a particular class whether produced domestically or imported.

The Application requests consideration of MRLs submitted by Patties Foods Limited (Patties Foods) to further align the Code with Codex and trading partner standards, in this Application, those of Chile, the exporting country.

The commodities for which MRLs are requested are individually quick frozen (IQF) blueberries and raspberries which are imported into Australia from Chile. Patties Foods import IQF blueberries and raspberries to fill a need for competitively priced ingredients in a convenient format for consumers wishing to incorporate blueberries and raspberries into their diets. The importation of IQF blueberries and raspberries allows year round access to these products for consumers.

The chemicals for which the MRLs are requested are Azoxystrobin (blueberry); Fenhexamid (blueberry); Fludioxonil (blueberry) and Bifenthrin (raspberry). These chemicals are already permitted to be used in Australia for other commodities.

Inclusion of the MRLs in the Code will permit the sale of foods containing legitimate residues and protect public health and safety by minimising residues in foods consistent with the effective control of pests and diseases.

This requested amendment will:

- further align the Code with Codex and trading partner standards;
- minimise potential trade disruption;
- ensure continuity of supply; and
- extend consumer choice.

Recognition of MRLs for IQF blueberries and raspberries would not be expected to increase dietary exposure to these chemicals significantly beyond that already in the diet from local use patterns. Consequently, no adverse public health and safety consequences are anticipated, for any population group or sub-group, from the consumption of blueberries or raspberries containing residues of the named chemicals at or below the Codex MRLs.

The Application seeks to address specific anomalies between the Code and Codex which present barriers to trade in IQF blueberries and raspberries. The proposed amendments to the Code would align limits in the Code with international standards and/or standards in the producer country (Chile) and permit the sale in Australia of IQF blueberries and raspberries containing legitimate residues that do not present health or safety concerns. AFGC has concluded that the proposed amendments are necessary, cost-effective and beneficial.