



August 9, 2012

Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610
Australia
Tel +61 2 6271 2222

RE: Submission – Proposal M1008 Maximum Residue Limits (2012)

Dear Sir or Madam:

The California Cherry Marketing and Research Board is a U.S. agricultural trade organization representing over 600 of California's cherry growers. Exports are a vital component of the California cherry industry, and Australia in particular is an important market for U.S. cherry growers, with exports of U.S. fresh cherries to Australia in 2010 valued at \$19.3 million USD. Given the importance of the Australian market for the California cherry industry, the Board appreciates the opportunity to provide comments to Food Standards Australia New Zealand (FSANZ) regarding the proposed cherry maximum residue level (MRL) announced in FSANZ Proposal M1008.

Upon review of Proposal M1008, the Board would like to express its support for the draft 5 ppm MRL for fenpropathrin on cherry, which would be equivalent to the current U.S. MRL. The Board thanks FSANZ for its transparency and cooperation in establishing this MRL.

Proposal M1008 also includes a proposal to reduce the current Australian MRL for carbendazim on cherry from 10 ppm to 0.5 ppm. This would be even more restrictive than the 20 ppm U.S. MRL for thiophanate-methyl on cherry. The U.S. Environmental Protection Agency (EPA) includes carbendazim in its residue definition of thiophanate-methyl. Meanwhile, Australian MRLs established for carbendazim apply to thiophanate-methyl. As such, it is inferred that the Australian MRL for carbendazim on cherry relates to the U.S. MRL for thiophanate-methyl on cherry.

While the Board recognizes Australia's right to establish food standards as necessary for its national circumstance, there is concern among California cherry growers and merchants that the proposed carbendazim/cherry MRL at 0.5 ppm may unintentionally cause an impediment to trade. In light of this possibility, the Board respectfully requests that FSANZ consider adopting MRLs at a level more closely associated with the U.S. MRL of 20 ppm. An MRL closer to the U.S. tolerance would ensure there are no trade disruptions in shipments of California cherries to Australia.

On behalf of the California Cherry Marketing and Research Board, thank you for the opportunity to provide comments in response to Proposal M1008. Please do not hesitate to contact me should you have any questions regarding this submission.

Best regards,

Chris Zanolini
Executive Director