

Response to Proposal M1008 Maximum Residue Limits 2012

Dairy Australia is the dairy industry owned service organisation, whose members are farmers and industry bodies, including the Australian Dairy Farmers, and the Australian Dairy Products Federation.

The dairy industry exports about half of Australia's milk production, to more than 100 countries; this makes Australia the fourth largest trader of dairy products on the world market, behind New Zealand, the European Union and the United States.

Our efforts to maintain and improve access to international markets include active engagement in international standard setting forums, such as Codex Alimentarius.

The dairy industry has consistently argued for regulatory harmonisation at national and international levels, whenever possible. To facilitate exports we are aware that Australia regularly asks other countries to adopt Codex standards as a matter of course, and to adopt standards that allow for good agricultural or veterinary practice in Australia, where this is not already covered in Codex.

The Executive Summary of the Proposal refers to harmonisation of Food Standards Code MRLs with Codex MRLs, however the detail (Table in Section 3.3.3) shows that in most cases FSANZ has opted for import tolerances in line with USA requests rather than accepting the relevant Codex MRL. In many cases the Codex MRL is higher than that requested by the USA.

In the interest of facilitating trade, the internationally accepted standard (Codex) should be adopted as a matter of principle, rather than adopting an alternative, lower standard requested by just one country.

This approach should only be varied where import tolerances are proposed for compounds not registered in Australia and for which there are no corresponding Codex MRLs, or where an MRL higher than the Codex MRL is proposed to allow for use consistent with good agricultural or veterinary practice in the relevant country.

To maintain credibility in negotiating access with export partners Australia cannot leave itself open to criticism, complaint, or challenge because of unnecessarily restrictive regulations on imports.

We therefore ask FSANZ to follow the principle of consistency with Codex standards wherever possible.

Contact

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