



21 August 2013

Food Standards Australia New Zealand

PO Box 7186

CANBERRA BC ACT 2610

Via email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Dear Food Standards Australia New Zealand,

**Submission – Revision of Maximum Residue Limits M1009**

The Australian Beverages Council (the Beverages Council) is the peak body representing the \$7 billion non-alcoholic beverage industry. The Beverages Council provides a single, united industry voice to a range of stakeholders including government, non-government organisations, media and general public.

Membership of the Beverages Council comprises over 95% of the non-alcoholic industry's production volume, and is comprised of multi-national companies and small and medium businesses. The Beverages Council has two dedicated category divisions – Fruit Juice Australia and the Australasian Bottled Water Institute, which represent the unique interests of members manufacturing juice and bottled water products respectively.

The areas proposed for amendment by FSANZ relevant to members of Fruit Juice Australia include changes to residue limits for maximum residual limits. Fruit Juice Australia has previously provided support for this revision in particular in relation to the levels proposed for fenthion in apricot, cherries, citrus including citrus for juice, lemons and mandarins.

Australian Beverages Council Ltd

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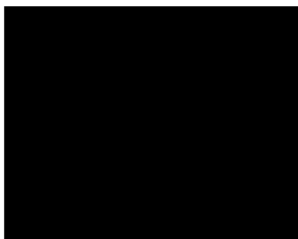
Amendments for other residues have generally aligned relevant beverage components to Codex standards. These residues found in fruit, vegetables, herbs and spices include abamectin, acetamiprid, azoxystrobin, bifenthrin, bromopropylate, carbendazim, chlorpyrifos, clofentezine, cyhalothrin, cyprodinil, fenpropathrin, fludioxonil, fluopicolide, hexythiazox, imidacloprid, iprodione, kresoxim-methyl, permethrin, pirimicarb, spirodiclofen, thiamethoxam, thiophanate-methyl and zoxamide.

It is noted that revised levels for boscalid, fenthion, flubendiamide and pyraclostrobin are lower than Codex limits.

The Beverages Council has consulted its membership most likely to be impacted by these proposed changes, and submit that this MRL revision provides workable levels and hence supports this proposal.

We thank FSANZ for the opportunity to provide this submission. If you wish to discuss any aspect of this correspondence in more detail I invite you to contact our office directly   
[info@australianbeverages.org](mailto:info@australianbeverages.org).

Yours sincerely,



Health and Regulatory Affairs Manager