



Submission to Consultation Paper – P1027 Managing Low-level Ag and Vet Chemicals without Maximum Residue Limits

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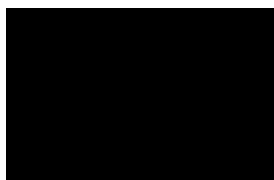
Foreword

The Victorian Farmers Federation is Australia's largest state farmer organisation, and the only recognised, consistent voice on issues affecting rural Victoria.

The VFF consists of an elected Board of Directors, a member representative Policy Council to set policy and eight commodity groups representing dairy, grains, livestock, horticulture, chicken meat, pigs, flowers and egg industries.

Farmers are elected by their peers to direct each of the commodity groups and are supported by Melbourne-based staff.

Each VFF member is represented locally by one of the 230 VFF branches across the state and through their commodity representatives at local, district, state and national levels. The VFF also represents farmers' views at many industry and government forums.



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The Victorian Farmer Federation (VFF) welcomes the opportunity to provide comment to the *P1027 Consultation Paper – Managing Low-level Ag and Vet Chemicals without Maximum Residue Limits*.

The agriculture industry, particularly horticulture, has long been calling for a way to manage technical breaches of the Code including:

- inadvertent residues, including spray drift and residues from older chemistry left in the soil;
- false positives from laboratory test results; and
- increasing sensitivity of analytical techniques

The residues found often pose no risk to public health, yet under current 'zero tolerance' legislation it means the product cannot legally be sold.

This can have serious consequences for the producer as in most cases the producer is immediately suspended from supply. They can also face criminal prosecution under current legislation. This places a significant burden on producers yet provides retailers with no options for managing the non-compliance to the Code.

The **VFF supports** the proposal to set an appropriate level of Maximum Residue Limits (MRLs) for *all other foods* putting an end to the current 'zero tolerance' system.

The VFF believes any levels set must use a risk based approach. The two examples used in the consultation paper of the fungicide boscalid and insecticide chlorantraniliprole, having MRLs for particular crops and *all other foods*, shows that the risk assessments should be conducted on actives and not on our understanding of the definition of chemical/food combinations.

The **VFF supports** the consideration of Codex and international MRLs when establishing Australian appropriate limits on *all other foods* however we strongly urge an individual risk based approach for products sold in the domestic market.

This would be similar to the European Union which incorporates Codex MRLs into their system but only after they've completed their own risk assessments.

On the issue of addressing false positives, which we know have a serious impact on producers, we believe a system similar to Europe should be implemented. In Europe it is accepted that there is a level of uncertainty in the testing results and have a +50 per cent tolerance of the existing MRL.

Conclusion

The VFF believes setting appropriate levels of MRLs for *all other foods*, through the risk assessment of actives, and providing a tolerance level against the uncertainty of test results is likely to address the concerns around inadvertent detections, false positives and increasing sensitivity of analytical techniques, while removing the 'zero tolerance' system.