

19 June 2013

Project Manager  
Application A1038  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear sir/madam,

**Application A1038 – Maximum Residue Limits for Blueberries & Raspberries**

**Call for submissions**

The Food & Beverage Importers Association supports the draft variations to Standard 1.4.2 proposed by FSANZ in its assessment of Application A1038.

That application seeks the inclusion of maximum residue limits (MRLs) for the agricultural chemicals Azoxystrobin, Fenhexamid and Fludioxonil in blueberries and Bifenthrin in raspberries in Standard 1.4.2 in the Australia New Zealand Food Standards Code.

The FBIA supports these proposals on these grounds:

1. Foods affected by the Proposal are currently imported.
2. The proposed MRLs align the limits in the Food Standards Code with international standards, such as those of the USA or CODEX.
3. The FSANZ safety assessment concludes that the proposed variations do not present health or safety concerns.
4. The Proposal provides for legitimate and safe trade.
5. The setting of maximum residue limits (MRLs) for these chemicals in these foods would be in line with the Ministerial Council Policy Guideline on the Regulation of Residues of Agricultural and Veterinary Chemicals in Food; in particular it would

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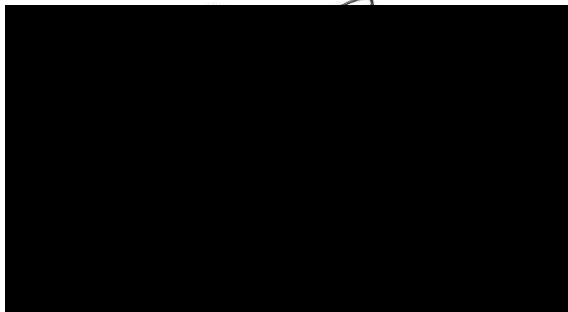
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- (a) be consistent with the effective regulation of the registration, permission and use of agricultural and veterinary chemicals;
- (b) promote a consistent approach to MRLs for both domestic and imported foods; and
- (c) be consistent with Australia's obligations under the World Trade Organisation (WTO) Sanitary and Phytosanitary Agreement (SPS Agreement).

Should you have any questions on these comments, please do not hesitate to contact me

Yours faithfully,



A J Beaver  
Secretary