



Food Standards Australia and New Zealand
PO Box 7186
Canberra
ACT 2610

20th June 2013

Re Submission Application A1083
Maximum residue limits for blueberries and raspberries

The Australia Blueberry Growers Association (ABGA) is the peak industry body representing commercial blueberry growers Australia wide. The ABGA has gone from a minor horticultural industry in 2005 worth approximately \$27M to an industry worth over \$86M in 2010/11 season (ABS Statistics). The industry continues to grow at approximately 10% per year and blueberries can now be harvested somewhere in Australia for almost 12 months of the year.

Most berries produced in Australia are harvested for the fresh market while less than 1 to 2 % would go to the frozen market if they did not meet fresh quality standards.

The ABGA acknowledges that having a year round supply of frozen blueberries at increases consumer awareness of the benefits of berries in a healthy diet. It is also important to note that imported frozen blueberries will now and have been competing with fresh Australian berry product that is available for almost 12 months of the year. It is very important to the industry that we have a 'level playing field' in terms of the Maximum Residue Levels (MRL) that exist in both the local and imported products.

The chemicals *Bifenthrin*, *Fluidoxinil Azoxystrobin* and *Fenahexamid* do not currently have label registrations or permits for their use on Blueberries in Australia.

FSANZ's assessment of Application A1083 needs to provide a consistent approach to local and imported produce in terms of chemical registrations and MRL for both local and imported product in order not to disadvantage Australian producers.

At the present time Australian blueberry producers are unable to use these products to control pest and disease and there is currently a permit with APVMA for *Bifenthrin* for elephant weevil control.

The MRLs in the CODEX lists an MRL for Blueberries with *Bifenthrin* as 1.0mg/kg and *Azoxystrobin* as 5m/kg but at this time neither are registered for use in Blueberries.

The ABGA requests that before accepting the proposed variation to the food standard code the following be done

1. Delay the approval for the importation of Chilean Blueberries until minor use permits are issued for *Bifenthrin* and that the MRL for the local product be also set at the same MRL as the imported product
2. Hasten the granting of permits for these products to Australian growers and accept the CODEX MRLs without further local testing.
3. Ensure the use of *Bifenthrin* on Blueberries is listed on the chemical label before the granting of access to imported produce.

The ABGA looks forward to a response from FSANZ after considering this application for imported frozen Chilean blueberries and to your support for the rapidly expanding Australian Blueberry Industry

Should you wish for clarification on the Blueberry industry submission, please do not hesitate to contact me

Yours faithfully



Phillip Wilk
Industry Development Officer
(on behalf of the ABGA)