

Australian Food and Grocery Council SUBMISSION

JULY, 2012

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

IN RESPONSE TO:
PROPOSAL M1008 MAXIMUM RESIDUE LIMITS (2012)
(16-12)

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover of \$108 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. The industry is similar in size to the mining sector.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry. Representing 26 per cent of total manufacturing turnover, the sector is the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

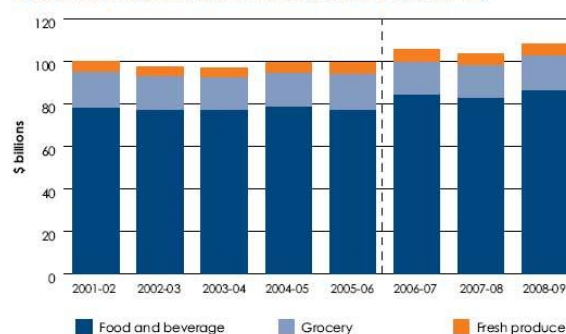
This growing and sustainable industry is made up of over 30,100 businesses and accounts for \$46 billion of the nation's international trade. The industry spends \$368 million a year on research and development.

The food and grocery manufacturing sector employs more than 312,000 Australians, representing about 3 per cent of all employed people in Australia, paying around \$13 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia². It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Figure 4.1: Composition of the industry's turnover (\$2008-09)



Source: ABS, catalogue number 8221.0 and 8159.0

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

² About Australia: www.dfat.gov.au

1. INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcome the opportunity to provide a written submission to Food Standards Australia New Zealand (FSANZ) in response to Proposal *M1008, Maximum Residue Limits (2012)*.

2. OVERALL POSITION

The AFGC supports this proposal on the basis that in relation to current health-based guidance values, setting the limits as proposed does not present any public health and safety concerns.

3. GENERAL COMMENT

The AFGC support FSANZ's role in maintaining an updated Australia New Zealand Food Standards Code (the Code) in order to reflect the current status of agricultural and veterinary chemicals in use in Australia and to support trade through recognition of these agvet chemicals in use in other markets.

In principle, AFGC support harmonisation of MRLs in the Code with Codex MRLs, providing that there is no risk to public health and safety.

AFGC note that in relation to the recommendations in M1008, in a number of cases FSANZ has opted for import tolerances in line with importing country MRLs rather than adopting the relevant Codex MRL.

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AFGC MEMBERS LIST AS AT 30 JULY 2012

Arnott's Biscuits Limited
 Australian Blending Company P/L
 Barilla Australia Pty Ltd
 Beak & Johnston Pty Ltd
 Beechworth Honey Pty Ltd
 Beerenberg Pty Ltd
 Bickfords Australia
 Birch and Waite Foods Pty Ltd
 Body Science International
 Bronte Industries Pty Ltd
 Bulla Dairy Foods
 Bundaberg Brewed Drinks Pty Ltd
 Bundaberg Sugar Limited
 Byford Flour Mills T/a Millers Foods
 Byron Food Services
 Campbell's Soup Australia
 Canon Foods
 Cantarella Bros Pty Ltd
 Carman's Fine Foods Pty Ltd
 Cerebos (Australia) Limited
 Cheetham Salt Ltd
 Christie Tea Pty Ltd
 Church & Dwight (Australia) Pty Ltd
 Clorox Australia Pty Ltd
 Coca-Cola Amatil (Aust) Limited
 Coca-Cola South Pacific Pty Ltd
 Colgate-Palmolive Pty Ltd
 Coopers Brewery Limited
 Danisco Australia Pty Ltd
 Devro Pty Ltd
 DSM Food Specialties Australia Pty Ltd
 Earlee Products
 Eagle Boys Pizza
 FPM Cereal Milling Systems Pty Ltd
 Ferrero Australia
 Fibrisol Services Australia Pty Ltd
 Fonterra Brands (Australia) Pty Ltd
 Food Spectrum Group
 Freedom Foods
 Frucor Beverages (Australia)
 General Mills Australia Pty Ltd
 George Weston Foods Limited
 GlaxoSmithKline Consumer Healthcare
 Go Natural
 Goodman Fielder Limited
 Gourmet Food Holdings
 H J Heinz Company Australia Limited
 Harvest FreshCuts Pty Ltd
 Healthy Snacks
 Hoyt Food Manufacturing Industries P/L
 Hungry Jack's Australia
 IGEA Group
 Jalna Dairy Foods
 JBS Australia Pty Limited
 Johnson & Johnson Pacific Pty Ltd
 Kellogg (Australia) Pty Ltd
 Kerry Ingredients Australia Pty Ltd
 Kimberly-Clark Australia Pty Ltd
 Kraft Foods Asia Pacific

Laucke Flour Mills
 Lindt & Sprungli Australia
 Lion Dairy and Drinks
 Madura Tea Estates
 Manildra Harwood Sugars
 Mars Australia
 McCain Foods (Aust) Pty Ltd
 McCormick Foods Aust. Pty Ltd
 McDonald's Australia
 Merisant Manufacturing Aust. Pty Ltd
 Metarom Australia
 Mrs Mac's Pty Ltd
 Murray Goulburn Co-operative
 Myosyn Industries
 Nerada Tea Pty Ltd
 Nestlé Australia Limited
 Nutricia Australia Pty Ltd
 Ocean Spray International Inc
 Only Organic 2003 Pty Ltd
 Parmalat Australia Limited
 Patties Foods Pty Ltd
 Pfizer Consumer Healthcare
 Popina (Vic) Pty Ltd
 Procter & Gamble Australia Pty Ltd
 Queen Fine Foods Pty Ltd
 QSR Holdings
 Reckitt Benckiser (Aust) Pty Ltd
 Red Bull Australia
 Rosella Foods Pty Ltd
 Sandhurst Fine Foods
 Sanitarium Health and Wellbeing
 Sara Lee Australia
 SCA Hygiene Australasia
 Schweppes Australia
 Sensient Technologies
 Simplot Australia Pty Ltd
 Solaris Paper
 Spicemasters of Australia Pty Ltd
 Steric Pty Ltd
 Stuart Alexander & Co Pty Ltd
 Subway
 Sugar Australia Pty Ltd
 SunRice
 Tasmanian Flour Mills Pty Ltd
 Tate & Lyle ANZ
 The Smith's Snackfood Co.
 The Vege Chip Company
 The Wrigley Company
 Tixana Pty Ltd
 Unilever Australasia
 Vital Health Foods (Australia) Pty Ltd
 Ward McKenzie Pty Ltd
 Yakult Australia Pty Ltd
 Yum Restaurants International
Associate & *Affiliate Members
 Addisons
 Australian Pork Limited
 ACI Operations Pty Ltd
 Allens Arthur Robinson
 Amcor Fibre Packaging
 *ASMI
 AT Kearney
 Baker & McKenzie
 *Baking Association Australia
 Benchmarking for Performance

Bizcaps Software
 Brisbane Marketing
 CHEP Asia-Pacific
 CSIRO Food and Nutritional Sciences
 *CropLife
 CROSSMARK Asia Pacific
 Dairy Australia
 Ettlin International
 FACTA (Food Allergen Control Training Analysis)
 *Food & Beverage Importers Ass.
 Food Liaison Pty Ltd
 *Foodservice Suppliers Ass. Aust.
 *Food industry Association QLD
 *Food Q
 Foodbank Australia Limited
 *Grains & Legumes Nutrition Council
 Grain Growers
 Grant Thornton
 GS1
 Harris Smith
 IBM Business Cons.
 Infosys
 innovations & solutions
 KPMG
 King & Wood Mallesons
 Legal Finesse
 Linfox Australia Pty Ltd
 Logan Office of Economic Dev.
 Meat and Livestock Australia Limited
 Monsanto Australia Limited
 New Zealand Trade and Enterprise
 Pacific Strategy Partners
 *PLMA Australia / New Zealand
 QLD DEEDI
 Red Rock Consulting
 Rentokil Initial
 RQA Product Risk Institute
 Simons Green Energy
 Six Degrees Executive
 Spectrum Automation
 StayinFront Group Australia
 Strikeforce Alliance
 Swire Cold Storage
 Swisslog Australia Pty Ltd
 Tetra Pak Marketing Pty Ltd
 The Food Group Australia
 The Nielsen Company
 Touchstone Cons. Australia Pty Ltd
 Visy Pak
 Wiley & Co Pty Ltd
PSF Members
 Amcor Packaging Australia
 Bundaberg Brewed Drinks Pty Ltd
 Schweppes Australia Pty Ltd
 Coca-Cola Amatil (Aust) Limited
 Lion Dairy and Drinks
 Owens Illinois
 Visy Pak