



## U.S. CRANBERRY MARKETING COMMITTEE

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August 3, 2012

Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA BC ACT 2610  
AUSTRALIA

Dear Sir or Madam:

The United States Cranberry Marketing Committee (CMC) is writing in support of the seven draft cranberry maximum residue levels (MRLs) announced in Food Standards Australia New Zealand (FSANZ) **Proposal M1008**.

The CMC is a national organization representing 100% of the U.S. cranberry growers in the states of Connecticut, Massachusetts, Michigan, Minnesota, New Jersey, New York, Oregon, Rhode Island, Washington and Wisconsin. Australia is an important market for U.S. cranberry industry, with exports of U.S. cranberry products to Australia in 2010 valued at U.S. \$27.4 million. As cranberries are not grown in Australia, having these cranberry MRLs in the food code will ensure consumer confidence in and access to the product and prevent unintentional irritations to trade.

In 2011, Australia published six new cranberry MRLs in response to a request from the U.S. cranberry industry. The U.S. cranberry industry was appreciative of these developments and in April 2011 wrote again to FSANZ seeking the establishment of several additional Australian cranberry MRLs.

Proposal M1008 includes seven of these MRL requests, which are each proposed to be harmonized with the U.S. MRLs established by the U.S. Environmental Protection Agency (EPA):

Active Ingredient	Commodity	Proposed FSANZ MRL (ppm)	Current U.S. MRL (ppm)
Acetamiprid	Cranberry	0.6	0.6
Bifenazate	Cranberry	1.5	1.5
Chlorantraniliprole	Cranberry	1	1
Clothianidin	Cranberry	0.01	0.01
Fluoxastrobin	Cranberry	1.9	1.9
Novaluron	Cranberry	0.45	0.45
Spiromesifen	Cranberry	2	2

The CMC appreciates FSANZ's transparency and cooperation in considering these recent requests, and would like to express its strong support for the above noted MRLs included in Proposal M1008.



Looking ahead, the CMC asks for FSANZ's continued cooperation in addressing two additional requests to establish cranberry MRLs for the compounds quinclorac and phosmet.

**Quinclorac:** The U.S. has a time-limited tolerance for quinclorac on cranberry, which is set to expire December 31, 2012. In its April 2011 letter, the CMC requested that Australia establish a quinclorac/cranberry MRL at the same level of the U.S. tolerance, 15 ppm. In its response, FSANZ replied that it could not consider this request because the U.S. tolerance is scheduled to expire or be revoked before the requested MRL variation can be made in Australia, adding that it would consider this request once a permanent U.S. MRL has been established.

In early 2012, the U.S. cranberry industry submitted a dossier to the U.S. EPA seeking to establish a permanent U.S. MRL for quinclorac on cranberries. Once the U.S. MRL is established, the industry plans to submit a request that FSANZ re-review this MRL request and consider establishing a quinclorac/cranberry MRL harmonized with the U.S. MRL. The industry would be pleased to provide FSANZ the data submitted to EPA upon request.

**Phosmet:** The U.S. cranberry industry also plans to request the establishment of an Australian MRL for phosmet on cranberry MRL at 10 ppm, which would be equivalent to the U.S. MRL. This request was submitted in 2012, but was too late to be included in Proposal M1008. We request that the establishment of an Australian MRL at 10ppm be considered under Proposal M1009 in the future.

Importantly, the establishment of the above two MRLs in Australia is of priority interest to the U.S. cranberry industry.

Finally, the U.S. cranberry industry would like an update on the possibility for an **acephate** cranberry MRL in Australia. This request was included in original request to FSANZ, but an MRL was not established as the compound was undergoing review. The industry is curious as to whether that review is completed and if a cranberry MRL might be considered at this point. There are both U.S. and Codex cranberry MRLs for this product. Please let us know if this is an option.

On behalf of the CMC, thank you for the opportunity to provide input in Australia's MRL-setting process. The establishment of the aforementioned cranberry MRLs will address many U.S. shippers' concerns with product destined for Australia and help avoid potential future trade irritants. Please do not hesitate to contact me for additional information.

Best regards, 

  
Scott Soares  
Executive Director

e.c.: , FSANZ  
, Cranberry Institute  
, Bryant Christie Inc.

