

HONEY PACKERS and MARKETERS

ASSOCIATION OF AUSTRALIA Inc. [REDACTED]

Incorporated in Western Australia. Members' liability is limited.



16 March 2021

Food Standards Australian New Zealand
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Submission Date: 15 March 2021

RE: FOOD STANDARDS AUSTRALIA AND NEW ZEALAND (FSANZ) GLYPHOSATE MRL SUBMISSION M1018

The Honey Packers and Marketers Association of Australia Inc. (HPMAA) is the peak industry association body that represent the marketing and packing sector of the industry. Australia's major Australian honey packers are members of this Association. HPMAA is a member of the peak industry body, which is the Australian Honey Bee Industry Council (AHBIC).

HPMAA have been supportive of the establishment of an MRL for glyphosate in honey at 0.2 mg/kg, as progressed by the APVMA in the Agricultural and Veterinary Chemicals Code (MRL Standard) Instrument 2019: [Agricultural and Veterinary Chemicals Code \(MRL Standard\) Instrument 2019 \(legislation.gov.au\)](https://www.legislation.gov.au).

It is noted that the APVMA requested that FSANZ incorporate the same MRL in Schedule 20 of the Food Standards Code. The M1018 harmonisation proposal is out for comment now, as released by FSANZ, which is proposing an MRL of 0.2 mg/kg for glyphosate in honey, which is the same as for other plant origin foods (P1027). This is a practical level to ensure industry compliance.

Regulators deliberately set MRLs at a level that ensures ongoing market access and industry compliance when the food safety health risk is inconsequential. Therefore the 0.2 mg/kg MRL for glyphosate has been determined by APVMA and proposed by FSANZ in the Code at a level that protects primary producers and enables legitimate honey product sales.

HPMAA notes that under the Trans-Tasman Mutual Recognition Arrangement (TTMRA), Australia and New Zealand accept food commodities that are legal for sale in each country regardless of the sale-related regulatory requirements in the individual country. There are significant quantities of New Zealand honey imported to Australia and we welcome MRL protection for Australian beekeepers with respect to glyphosate residues, which presently does not exist.

HPMAA supports the position of our domestic regulators to set an MRL for glyphosate in honey at 0.2 mg/kg.

Yours truly,

HONEY PACKERS & MARKETERS ASSOCIATION OF AUSTRALIA INC.

