

**U.S. COMMENTS ON WTO NOTIFICATION G/SPS/N/AUS/533
CALL FOR SUBMISSIONS PROPOSAL M1020 – MAXIMUM RESIDUE LIMITS (2021)**

BEGIN U.S. COMMENTS:

The United States appreciates the opportunity to comment on Australia's measure G/SPS/N/AUS/533, which was notified to the World Trade Organization (WTO) on April 04, 2022. Australia has proposed new maximum residue limits (MRL) for dichlorvos at 0.01 ppm on "all other foods except animal food commodities", which includes almond (Table 1).

Dichlorvos is an important warehouse pest management tool used to combat storage insect pests such as beetles and moths. These pests can cause significant quality damage to stored almonds and result in economic losses in the form of rejected or downgraded product. It is used in rotation with pyrethroid based products. In 2021, the United States exported about \$11.1 million worth of almonds to Australia.

Table 1. Australia's proposed MRL, comparable Codex MRL and MRL approved for use in the United States.

Chemical	Plant Products	U.S. MRL (ppm)	Codex MRL (ppm)	Australia's current MRL (ppm)	Australia's proposed MRL (ppm)
Dichlorvos	Almond	2	--	--	0.01

The proposed MRL for dichlorvos is more restrictive than the U.S. MRL for the same compound and product combination and could negatively affect almond exports to Australia. The United States respectfully requests Australia to consider harmonization of dichlorvos MRL with the U.S. MRL in order to minimize trade disruptions. The United States also requests that Australia share its scientific justification for the proposed MRLs if the current MRL for dichlorvos is not considered for harmonization.

While Australia offers the opportunity to submit annual MRL harmonization requests through Food and Safety Australia and New Zealand (FSANZ), the United States requests that Australia harmonize the MRL on almonds through this WTO consultation, as this is a priority for the U.S. almond industry.

The United States does not have comments on the remainder of proposed MRLs.

END U.S. COMMENTS