

Friday 10th August 2012

Food Standards Australia New Zealand

Via email: submissions@foodstandards.gov.au

Submission regarding Proposal M1008 Maximum Residue Limits (2012)

Australian Pork Limited (APL) is the peak national representative body for Australian pig producers.

APL represents primary producers, most of whom rely on timely access to the safest, most effective chemicals, especially veterinary chemicals, in order to produce the best quality, safest pork for Australian and overseas consumers. Our industry also relies heavily on the grains industry which also requires access to safe, effective, reasonably priced chemicals.

The Australian pork industry maintains a small export market to Asia and New Zealand with around A\$120 million of pork exported from Australia in 2010-11.

The Australian pork industry engages at both a domestic and international level to maintain and improve access to international markets, including engagement with the Codex Alimentarius Commission.

The Australian pork industry consistently calls for regulatory harmonisation at national and international levels, whenever possible. To facilitate exports, industry is aware that Australia regularly asks other countries to adopt Codex Standards as a matter of course, and to adopt standards that allow for good agricultural or veterinary practice in Australia, where this is not already covered in Codex.

The Executive Summary of the Proposal refers to harmonisation of Food Standards Code MRLs with Codex MRLs, however the detail (Table in Section 3.3.3) shows that in most cases FSANZ has opted for import tolerances lower than the relevant Codex MRL.

In the interest of facilitating trade, the internationally accepted standard (Codex) should be adopted as a matter of principle, rather than adopting an alternative, lower standard.

This approach should only be varied where import tolerances are proposed for compounds not registered in Australia and for which there are no corresponding Codex MRLs, or where an MRL higher than the Codex MRL is proposed to allow for use consistent with good agricultural or veterinary practice in the relevant country.

To maintain credibility when negotiating market access with export partners, Australia should avoid unnecessarily restrictive regulations on imports.

APL requests that FSANZ follow the principle of consistency with Codex Standards wherever possible.



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