

## Response ID ANON-U9J3-1452-Q

Submitted to M1023 2024 MRL Harmonisation Proposal  
Submitted on 2026-03-05 16:57:36

### How to make your submission

The survey response form includes four sections.

Publishing your submission and consent to collect personal information

I consent to the collection of personal information in this online survey form.:  
Yes

### About you

Full name

Full name:  
Duncan Craig

Email address

Email address:  
duncan.craig@afgc.org.au

Contact person

Full name:

Email address:

Submitter name

Organisation - please write your organisation name in the box below.

Enter initials if you are an individual, or enter your organisation name:  
Australian Food & Grocery Council

Which group do you most identify with?

Food industry

If other, please specify::

If you wish to provide general background information about yourself or your organisation (if any), include this in the box below.

General background information about you or your organisation:

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

With an annual turnover in the 2023-24 financial year of \$172 billion, Australia's food and grocery manufacturing sector makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Each business in the sector has contributed towards an industry-wide \$3.8 billion capital investment in 2023-24.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 32% of total manufacturing turnover in Australia. The industry makes a large contribution to rural and regional Australia economies, with over 30 per cent of its 294,000 employees being in rural and regional Australia.

It is essential to 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.

The industry has a clear view, outlined in Sustaining Australia: Food and Grocery Manufacturing 2030, of its role in the expansion of domestic manufacturing, jobs growth, higher exports and enhancing the sovereign capability of the entire sector.

### Your submission

Have you read the proposal M1023 Consultation documents?

Yes

Please provide your overall view on FSANZ's assessment for proposal M1023 and the draft regulatory measure.

Support

Please explain your response below.:

Members of the AFGC import food and ingredients into Australia which may contain residues of agricultural and veterinary (agvet) chemicals arising from intentional use during agricultural production and/or low-level cross-contamination (such as spray drift or soil residue when crops are rotated or from other co-mingling).

Compliance with the MRLs in Schedule 20 of the Food Standards Code (the Code) is challenging when these MRLs vary from those in other jurisdictions (and Codex) and may represent a regulatory burden and trade barrier. Therefore, the AFGC welcomes initiatives to align domestic MRLs with those accepted internationally.

Overall, the AFGC supports the assessment and variations to the Code as proposed under M1023.

However, we wish to draw your attention to an error on p21 of Supporting Document 1 which infers new MRLs being proposed for Chlorfluazuron and Chlorothalonil in citrus fruit, which is not the case (not included in the proposed variations in the Call for Submissions report).

If there is any other information you would like to provide for the proposal M1023 consultation, please include this in the box below.

Any other information:

Supplementary data or information

You may upload a supporting document here.:

No file uploaded

Reference list

You may provide your reference list here, if any.:

Confidential information

Do you wish to provide confidential information as part of your submission?

No

Feedback

What is your level of satisfaction using FSANZ's Consultation Hub to complete your submission?

Satisfaction level - Guidance provided to make your submission:

Satisfaction level - Using the Consultation Hub:

Satisfaction level - Time and effort:

Satisfaction level - Overall satisfaction:

If you wish to explain your responses, please do so below.: