

From: Stanley, Glenn [REDACTED]
Sent: Thursday, 20 December 2012 8:56 AM
To: BA - Plant Biosecurity Contact
Cc: [REDACTED]
[REDACTED]

Subject: Draft Report for the non-regulated analysis of existing policy for fresh lychee fruit from Taiwan and Vietnam [SEC=UNCLASSIFIED]

Dear Sir/Madam

FSANZ would like to submit the following comments:

Irradiation is a known effective treatment for fruit fly infestation. For fruits and vegetables that are hosts to the fruit fly the required treatment is applied in accordance with international requirements (under ISPM 18; 2003). [IPPC (2003). International Plant Protection Convention. International Standards for Phytosanitary Measures, ISPM No. 18 Guidelines for the Use of Irradiation as a Phytosanitary Measure. Secretariat of the International Plant Protection Convention. Food and Agriculture Organisation of the UN, Rome, Italy, 2006. Accessed February 2012 at [https://www.ippc.int/index.php?id=1110798&tx_publication_pi1\[showUid\]=23881&frompage=13399&type=publication&subtype=&L=0#item](https://www.ippc.int/index.php?id=1110798&tx_publication_pi1[showUid]=23881&frompage=13399&type=publication&subtype=&L=0#item) .]

FSANZ understands that irradiation is viewed as an important pest reduction protocol for acceptance of produce for domestic and international trade from other countries. In 2003, irradiation of Lychees were approved for use as a phytosanitary treatment in Standard 1.5.3 - Irradiation of Food in the *Australia New Zealand Food Standards Code* (the Code). In the Code, a minimum dose of 150 Gy and maximum dose of 1 kGy provides a dose range in order for quarantine agencies to consider irradiation as a treatment for pest disinfection on lychees when they are undertaking their import risk assessments.

FSANZ notes that on page 90 of the attached Draft Report there are references to the following minimum doses proposed to mitigate the risks posed by the quarantine pests from Taiwan and/or Vietnam:

- 150 Gy for *Bactrocera cucurbitae* and *Bactrocera dorsalis*
- 400 Gy for *Conopomorpha sinensis*, *Dysmicoccus lepelleyi*, *Paracoccus interceptus*, *Planococcus lilacinus*, *Planococcus litchi*, *Planococcus minor*, *Pseudococcus cryptus* and *Pseudococcus jackbeardsleyi*

The proposed doses are within the approved dose ranges for lychees in the Code.

In respect of chemical treatments:

If a specific chemical is used on lychees in either Taiwan or Vietnam to control pests of quarantine concern, then any resulting residues would need to meet the specific maximum residue limits (MRLs) in Standard 1.4.2 of the Code <http://www.comlaw.gov.au/Details/F2012C00822>.

Note, that if there is no MRL listed in the Code, then there is zero tolerance approach and Vietnam and/or Taiwan would have to apply to FSANZ to recognise an import MRL or a Codex MRL. FSANZ would undertake a dietary exposure assessment to determine whether there is any risk from the resulting residues on lychees for the specific chemicals where an MRL was requested. FSANZ will consider including Codex or other MRLs in the Code on a case-by-case basis where the residues are

safe in the context of the Australian diet; associated with the controlled use of a chemical product in the source country; and the food is permitted to be imported to Australia.

See link below which details the application process and note the section which describes the process of establishment of MRLs in Australia.

<http://www.foodstandards.gov.au/foodstandards/changingthecode/>

If you need further information on the application process, then please contact the Standards Management Officer on standards.management@foodstandards.gov.au or by phoning +61 2 6271 2280.

Regards Glenn Stanley

Dr Glenn Stanley
Assistant Section Manager
Product Safety Standards
Food Standards Australia New Zealand
Phone [REDACTED]
Fax [REDACTED]

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

Scanned by Clearswift SECURE Email Gateway at Food Standards ANZ.
