

**North American
Export Grain
Association, Inc.**



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Bureau of Food Safety
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RE: WTO Notice G/SPS/N/TPKM/111 of 26 July 2007

Thank you for this opportunity to comment on the proposed maximum residue limit (MRL) of 0.5 PPM for malathion on wheat. We also wish to express our gratitude for the important and successful trade relationship between the US and Taiwan. The Taiwan Department of Health is an important and integral partner in advancing our common interests.

The North American Export Grain Association (NAEGA), is a not for profit trade association, established in 1912. NAEGA consists of private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the bulk grain and oilseed exporting industry. NAEGA's mission is to promote and sustain the development of commercial export of grain and oilseed trade. NAEGA acts to accomplish this mission from its office in Washington D.C., and in markets throughout the world. NAEGA member companies ship and provide services for practically all of the bulk grains and oilseeds exported each year from the United States. Please accept and consider the following from NAEGA in response to WTO Notice G/SPS/N/TPKM/111 of 26 July 2007.

We are very concerned that the establishment of a 0.5 PPM MRL wheat will unnecessarily result in a major impediment to the food security interest of Taiwan by restricting, perhaps to the point of preventing, the importation of wheat from the United States. It is clear that such a level is not economically and commercially practical. We recognize the immediate need to provide for an MRL for malathion in wheat. However we believe 0.5 PPM level is inappropriate as well as impractical.

Taiwan should not establish a MRL of 0.5 PPM for malathion in wheat and a scientifically valid decision can be made to establish a 8 PPM MRL. We encourage that full consideration be given to current information related to the use of malathion in the United States and risk assessment data provided by US Environmental Protection Agency (EPA) in its recently completed re-registration review of malathion. We are confident that this information is more than sufficient scientific justification to support your establishment an 8 PPM MRL for malathion in wheat as well other grains.

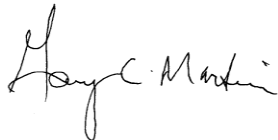
In reference to the Codex Official Standards for Pesticide Residues in Foods that were used as an important reference for proposing the 0.5 PPM MRL, it is critical to acknowledge that the Codex guidance for a 0.5 PPM MRL is based on pre harvest usage of malathion. Post-harvest use leaves a higher, but still safe residue. The most prominent use of malathion on wheat in the US and a number of other countries is the post-harvest use to protect wheat from insect damage in storage. The Codex 0.5 PPM MRL is applicable for field (pre-harvest) use of malathion. As such and contrary to current Codex guidelines, the standard should not be applied when post harvest use of the malathion prevails. Recognizing this important distinction, an 8 PPM MRL is commonly established. For instance Japan, South Korea, the European Union and Canada all have an 8 PPM MRL for malathion.

The US EPA has established a limit of 8 PPM and it is only for post harvest use. The US production and handling system strictly adheres to the EPA regulation. The United States Department Agriculture's Federal Grain Inspection Service's current data on pesticide residues shows that in 10 years of continual testing of US wheat at export levels have never been above 8 PPM.

It is very important from both scientific and economic perspectives that the proposed 0.5 PPM MRL for malathion not be established and an 8 PPM MRL be implemented.

Thank you again for your consideration of these comments. We recognize the difficult task of the Bureau of Food Safety at the Department of Health in completing its obligations in this regard. We wish to support your work in any way that is appropriate and possible.

Sincerely,



President and CEO

CC:

Taiwan Flour Mills Association
Government of the United States, USDA/ FAS
NAEGA Board of Directors