

**Comments from the Victorian Department of Health and Human Services, the Victorian Department of Economic Development, Jobs, Transport and Resources**

**Due date of submission – 5 December 2016**

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) welcome the opportunity to comment on A1133 - the application to amend the table to S20-3 of Schedule 20 of the *Australia New Zealand Food Standards Code* (the Code) to include an MRL for avilamycin in specific pig commodities.

The departments note that there is not currently an MRL for avilamycin in pig commodities in the Code. In response to A1133, the departments note the intention of Food Standards Australia New Zealand (FSANZ) to amend the Code to include MRLs for avilamycin in pig commodities that align with those set by Codex. The departments understand that MRLs for avilamycin in pig commodities are being sought due to an increased potential for importation of pig commodities from the USA. It is not clear from the call for submissions for what purpose avilamycin has been approved for use in pigs in the USA. It is also not clear whether avilamycin has been approved by the Australian Pesticide and Veterinary Medicines Authority for use in pigs in Australia.

However, the departments note FSANZ's assessment that inclusion of MRLs for avilamycin in pig commodities in the Code poses no risk to public health and safety. In particular, the departments note that assessments undertaken by FSANZ show that the proposed limits for avilamycin in pig commodities do not substantially increase dietary exposure and do not present a risk for development of antimicrobial resistance in humans. On this basis, the departments support the proposal.