

Comments from the Victorian Department of Health and Human Services and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 24 January 2020

The Victorian Departments of Health and Human Services, and Jobs, Precincts and Regions (the departments) welcome the opportunity to provide comments on Proposal M1017 – Maximum Residue Limits (2019).

It is understood that Proposal M1017 is a routine proposal prepared by Food Standards Australia New Zealand (FSANZ) to vary certain Maximum Residue Limits (MRLs) of chemicals in food in the *Australia New Zealand Food Standards Code* (the Code) to align with those established by Codex, or trading partner standards for food import purposes. This Proposal includes changes to over two hundred agricultural and veterinary (agvet) chemicals and also includes amendments requested by the Australian Pesticides and Veterinary Medicines Authority.

The departments have considered the information provided by FSANZ, including risk assessments that indicate no public health and safety concerns with the proposed MRLs. FSANZ has a system in place to assess and approve the MRLs of agvet chemicals through which these dietary exposure studies have been conducted according to recognized international principles to ensure the protection of health and safety of consumers, which is the primary requirement of the Code.

However, we note that a number of the proposed MRL changes differ from values set by either the European Union (EU) or CODEX, the latter of which is the principle source of MRLs at the international level¹. One example of a proposed MRL level that does not accord with international systems is Chlorothalonil, where the current level 0.2 mg/ kg is being increased to 0.3 mg/kg for peanuts. This proposed maximum level is three times that specified by both the EU and CODEX (0.1 mg/ kg) and six times the maximum level set in China (0.05 mg/kg).

It would be useful for FSANZ to provide to jurisdictions more detail about why this MRL, and others proposed in Proposal M1017, are considered suitable in food consumed in Australia, when they do not accord with levels set by international expert groups.

The departments also seek advice on what consideration that FSANZ has given to whether the higher MRLs proposed in M1017 will promote agvet chemical use that is inconsistent with Good Agricultural Practice in both Australia and in countries importing food to Australia and result in higher levels of chemicals than necessary on foods. Could FSANZ also provide us with information on what monitoring is in place nationally to ensure changes in MRLs are not leading to increased use of these chemicals more broadly and increased exposure.

¹ The CODEX Committee on Pesticides Residue is informed by the recommendations of the relevant Food and Agriculture Organization/World Health Organization meeting.

<http://www.fao.org/pesticide-registration-toolkit/tool/page/pret/limites-maximales-de-rsidus>