



Supporting Document 1

SAFETY ASSESSMENT METHODOLOGY

PROPOSAL M1005

MAXIMUM RESIDUE LIMITS (APRIL-SEPTEMBER 2009)

Safety Assessment Methodology

1.1 Determining the Residues of a Chemical in a Treated Food

The APVMA assesses a range of data when considering the proposed use of a chemical product on a food. These data enable the APVMA to determine what the likely residues of a chemical will be on a treated food. These data also enable the APVMA to determine what the maximum residues will be on a treated food if the chemical product is used as proposed and from this, the APVMA determines an MRL.

The MRL is the maximum level of a chemical that may be in a food and it is not the level that is usually present in a treated food. However, incorporating the MRL into food legislation means that the residues of a chemical are minimised (i.e. must not exceed the MRL), irrespective of whether the dietary exposure assessment indicates that higher residues would not risk public health and safety.

1.2 Determining the Acceptable Reference Health Standard for a Chemical in Food

The Office of Chemical Safety and Environmental Health (OCSEH) assesses the toxicology of agricultural and veterinary chemicals and establishes the acceptable daily intake (ADI) and where appropriate, the acute reference dose (ARfD) for a chemical. In the case that an Australian ADI or ARfD has not been established, a Joint Food and Agriculture Organization / World Health Organization Meeting on Pesticide Residues (JMPR) ADI or ARfD may be used for risk assessment purposes.

Both the APVMA and FSANZ use these reference health standards in dietary exposure assessments.

The ADI is the daily intake of an agricultural or veterinary chemical, which, during the consumer's entire lifetime, appears to be without appreciable risk to the health of the consumer. This is on the basis of all the known facts at the time of the evaluation of the chemical. It is expressed in milligrams of the chemical per kilogram of body weight.

The ARfD of a chemical is the estimate of the amount of a substance in food, expressed on a body weight basis that can be ingested over a short period of time, usually during one meal or one day, without appreciable health risk to the consumer, on the basis of all the known facts at the time of evaluation.

1.3 Calculating Dietary Exposure

The APVMA and FSANZ undertake chronic dietary exposure assessments for all agricultural and veterinary chemicals and undertake acute dietary exposure assessments where either the OCSEH or JMPR has established an ARfD.

The APVMA and FSANZ have agreed that all dietary exposure assessments for agricultural and veterinary chemicals undertaken by the APVMA will be based on food consumption data for raw commodities, derived from individual dietary records from the latest National Nutrition Survey (NNS) and chemical residue data provided by the APVMA or FSANZ. The Australian Bureau of Statistics with the then Australian Government Department of Health and Aged Care undertook the latest NNS over a 13-month period (1995 to early 1996). The sample of 13,858 respondents aged 2 years and older was a representative sample of the Australian population and, as such, a diversity of food consumption patterns was reported.

1.3.1 Chronic Dietary Exposure Assessment

The National Estimated Daily Intake (NEDI) represents an estimate of chronic dietary exposure. Chemical residue data, as opposed to the MRL, are the preferred concentration data to use if they are available, as they provide a more realistic estimate of dietary exposure. The NEDI calculation may incorporate more specific data including food consumption data for particular sub-groups of the population. The NEDI calculation may take into account such factors as the proportion of the crop or commodity treated; residues in edible portions and the effects of processing and cooking on residue levels; and may use median residue levels from supervised trials rather than the MRL to represent pesticide residue levels. Monitoring and surveillance data or data from total diet studies may also be used, such as the 19th and 20th Australian Total Diet Surveys (ATDS).

FSANZ is currently undertaking the 23rd ATDS (now the Australian Total Diet Study). The study will analyse the levels of various agricultural and veterinary chemicals in food and estimate the potential dietary exposure of population groups in Australia to those chemicals.

In conducting chronic dietary exposure assessments, the APVMA and FSANZ consider the residues in foods that could result from the permitted uses of a chemical product. Where data are not available on the specific residues in a food then a cautious approach is taken and the MRL is used. The use of the MRL in dietary exposure estimates may result in considerable overestimates of exposure because it assumes that the chemical will be used on all crops for which there is a registered use or an approved permit; treatment occurs at the maximum application rate; the maximum number of permitted treatments have been applied; the minimum withholding period applies; and that the entire national crop contains residues equivalent to the MRL. In agriculture and animal husbandry this is not the case, but for the purposes of undertaking a risk assessment, it is important to be conservative in the absence of reliable data to refine the dietary exposure estimates further. In reality, only a portion of a specific crop is treated with a pesticide; most treated crops contain residues well below the MRL at harvest; and residues are usually reduced during storage, preparation, commercial processing and cooking. It is also unlikely that every food for which an MRL is proposed will have been treated with the same pesticide over the lifetime of consumers.

The residues that are likely to occur in all foods are multiplied by the mean daily consumption of these foods derived from individual dietary records from the latest NNS for all survey respondents regardless of whether they consumed the food or not. These calculations provide information on the level of a chemical that is consumed for each food and take into account the consumption of processed foods e.g. apple pie and bread. The estimated exposure for each food is added together to provide the total mean dietary exposure to a chemical from all foods with MRLs.

The estimated mean dietary exposure is then divided by the average Australian's bodyweight to provide the amount of chemical consumed per day per kg of human bodyweight.

1.3.2 Acute Dietary Exposure Assessment

The National Estimated Short Term Intake (NESTI) is used to estimate acute dietary exposure. Acute (short term) dietary exposure assessments are undertaken where the OCSEH has determined an ARfD for a chemical or advised that a JMPR ARfD is appropriate. Acute dietary exposures are normally only estimated for raw unprocessed commodities (fruit and vegetables) but may include consideration of meat, offal, cereal, milk or dairy product consumption on a case-by-case basis.

The NESTI is calculated in a similar way to the chronic dietary exposure. Generally, the residues of a chemical in a specific food are multiplied by the 97.5th percentile food consumption of that food based on consumers only, if appropriate the exposure is divided by a mean body weight for the population group being assessed and this result is compared to the ARfD. The exact equations for calculating the NESTIs differ depending on the type or size of the commodity. These equations are set and used internationally. NESTIs are calculated from ARfDs set by the OCSEH or JMPR, consumption data from the 1995 NNS and the MRL when the data on the actual residues in foods are not available.

The NESTI calculation incorporates the large portion (97.5th percentile) food consumption data and can take into account such factors as the highest residue on a composite sample of an edible portion; the supervised trials median residue (STMR), representing typical residue in an edible portion resulting from the maximum permitted pesticide use pattern; processing factors which affect changes from the raw commodity to the consumed food and the variability factor where appropriate.

1.3.3 Risk Characterisation

The estimated mean chronic dietary exposure is compared to the ADI to characterise risk to the Australian population. FSANZ considers that the chronic and acute dietary exposure to the residues of a chemical is acceptable where the best estimates of mean chronic and acute dietary exposure do not exceed the ADI or ARfD.